

15.12.2020

**Representations to the Stroud District Local Plan Review – Draft Plan
Additional Housing Options Consultation
On Behalf of [REDACTED]
Land at Brimscombe Lane, Stroud, GL5 2RF**

Introduction

Representations are made regarding the Stroud District Local Plan Review – Additional Housing Options Consultation (Regulation 18, December 2020).

This representation is being submitted on behalf of [REDACTED], Land at Brimscombe Lane (the Site) is approximately 1 Ha.

This representation is to propose a residential allocation (the Site) for circa. 12 dwellings.

This submission should be considered alongside the Landscape Assessment from LVIA Ltd, site location plans and an indicative layout plan showing how the site could be brought forward for housing.

The Site



Aerial Photograph of the Site

The Site is within the ward of Brimscombe and Thrupp Parish. The Site is located north of London Road, with Brimscombe Lane running along the northern boundary of the site. The surrounding area is a mix of industrial uses to the south and residential north of London Road and neighbouring the site.

The Site is currently set outside of the settlement development limit (Policy HC1) which runs along the southern boundary of the site. The Site is not within the AONB and is in a prime location for the expansion of the urban edge of the settlement since it has development to the south and east.

Brimscombe has local shops and offers a very good level of local community services and facilities (primary schools and pre-schools, places of worship, pubs, village hall, sports/playing fields and playgrounds). Brimscombe has an important employment role along the valley between Stroud and Chalford.



Local Plan Proposals Map for Stroud indicating location of site

In this respect, a housing allocation in this location would be in keeping with the neighbouring uses of the area including the allocated housing and employment site to the south west at Brimscombe Mill. The visual impact of any residential development is limited, given the context of the site adjacent to existing housing and could be mitigated through layout, design and landscaping.

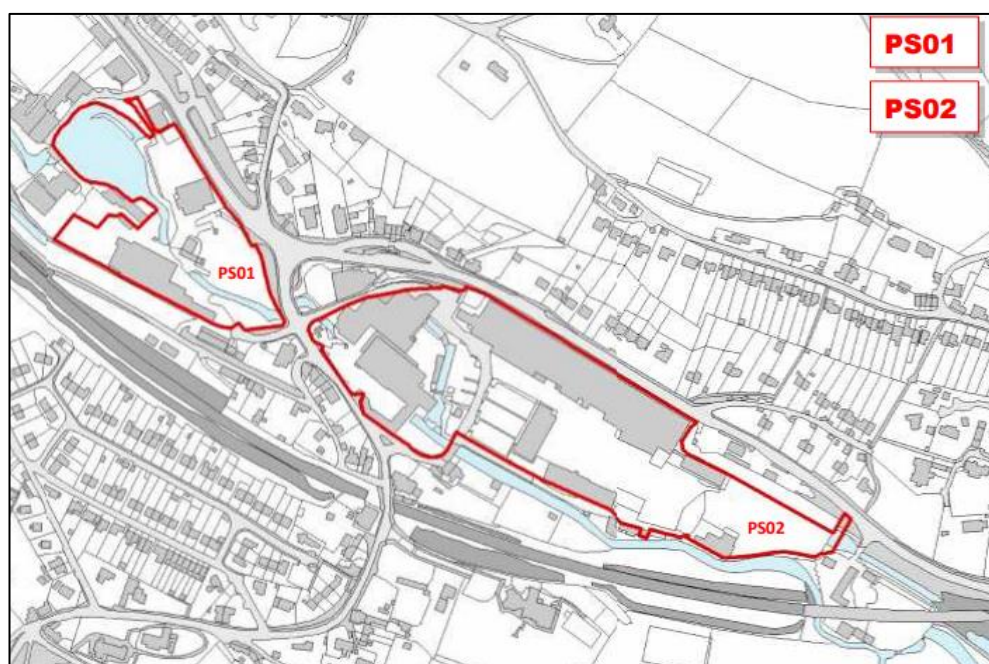
The Site is also outside of the Industrial Heritage Conservation Area (Policy ES10). The Site has no further constraints and is not within a flood zone 2 or 3 as indicated by the Environment Agency flood maps for planning.

Residential Site Allocation Proposal

Stroud's current consultation considers the spatial options of additional housing land across 7 options or a spatial option of a reserve housing supply. This response endorses spatial option 1.1 and option b which considers additional housing at towns and villages. If option b is chosen to provide further housing sites at smaller Tier 2 towns and Tier 3 larger villages within the district, then this site at Brimscombe would be suitable allocation to meet the housing need for the district.

The role and function of the settlement of Brimscombe for the Stroud District is as a Tier 3a settlement. The Stroud Draft Plan 2019 Policy CP3 page 50 notes “Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements”. This Site would therefore be suitable for allocation within the Draft Local Plan.

As it stands only two allocations are proposed within the Draft Plan (PS01 Brimscombe Mill & PS02 Brimscombe Port), which were allocated in the adopted Stroud Local Plan. These total 190 dwellings across the two site allocations. Both are previously developed sites and will no doubt take some time to come forward. Indeed, Brimscombe Port, due to its high infrastructure costs, requires public funding.



Stroud Draft Local Plan (2019) Brimscombe and Thrupp Draft Site Allocations

Although this consultation does not require comments on the previous draft plan consultation document, it does need mentioning considering that Policy C2 page 48, states “Stroud District will accommodate at least 12,800 additional dwellings, to meet the needs of the District for the period 2020-2040”. This Site would help to meet that need and is suitable, available, achievable and deliverable.

Accompanying this representation is a landscape report by LVIA Ltd which considers the potential landscape and visual impact of a residential scheme and associated works on the site. The study concluded that the site landscape context is not sensitive in urban design terms due to its situation and that the scheme layout could be sensitively designed to blend visually with its surroundings.

Housing Delivery

As quoted in the Local Plan Review Additional Housing Options Consultation “this revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum.” Although 663 homes were built in the District last year, in order to meet the higher target over the 20-year plan period it will require the Local Plan to identify more land. This consultation for additional housing sites meets that need to reassess the housing requirement and allocate more housing.

Paragraph 59 of the NPPF makes it clear that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land come forward where it is needed...” This Site would contribute towards meeting this local and national housing need.

Paragraph 68 of the NPPF supports development of small and medium sites and recognises the important contribution that these sites can have to a five-year supply. This site would be classified as a small to medium sized site and would therefore meet one of the objectives set by Government for Local Authorities to allocate within their plans.

In addition, the site owner is a well-established local contractor well equipped to deliver the scheme and bring the site forward early in the Local Plan period to boost the Council’s housing land supply. This would be a genuinely deliverable scheme with all the main stakeholders already in place (e.g., architect, landscape consultant, planning consultant, contractor).

The Stroud District Settlement Role and Function Study Update (2018) highlighted the fact that housing accessibility and housing affordability varies markedly across different parts of the District. The settlement update states the “some of our smallest and lowest tier settlements have really good accessibility- by virtue of close proximity to higher tier settlements, or proximity to key transport corridors, or good, regular bus services, or all of the above”, of which Brimscombe is included.

The Site should be allocated for housing within the Stroud District Local Plan Review – as residential allocation. The Site is adjacent a Tier 3a which is an accessible settlement with local facilities and would complement the existing urban form, fulfilling key goals of the wider spatial strategy, housing need and prioritising growth in the Districts larger settlements.

The Parish Council published a Parish Housing Needs Survey Report in August 2016. The report was written by Gloucestershire Rural Community Council (GRCC). The GRCC put together a survey to establish the affordable housing needs in the parish.

The survey was sent to 661 dwellings in the parish and they had 225 responses returned. One of the questions related to suggested sites for the development of affordable of which there were numerous suggestions. Some of the sites suggested are allocation sites within the adopted but as they are yet to be built out at this time it should be considered that this site along Brimscombe Lane could assist in meet that need. Alternatively, if not considered as an appropriate site for market led housing, this site could come forward as an affordable housing scheme and since the parish report indicates that there is already an established need.

Conclusion

This letter for the Stroud District Local Plan Review – Draft Plan Additional Housing Options Consultation (December 2020) demonstrates the Site comprises of land in a sustainable location, adjacent the settlement limit, its services and associated public transport routes. The site importantly falls outside the AONB and as accompanying Landscape Report demonstrates, the landscape context is not sensitive in urban design terms due to its situation. A residential scheme could be sensitively designed integrate well with the landscape and existing built form in the vicinity.

On this basis, we would urge Stroud District Local Plan Review – Draft Plan 2020 Consultation to allocate the land for housing. This Site would help to meet housing need and access to services and facilities across the District and is suitable, available, achievable and deliverable scheme within the next five years and would contribute to the districts five-year housing land supply.

We look forward to your response on these matters in due course as part of the on-going consultation process.

Attachments

Site Location Plan 1 - 2570-01-00-001
Site Location Plan 2 - 2570-01-00-002
Indicative Layout Plan 2570-00-00-500
Landscape Study – LVIA Ltd